

Document Page 1 of 2
UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Gillman, Bruton & Capone, LLC
60 Highway 71, Unit 2
Spring Lake Heights, NJ 07762
(732) 528-1166
Attorney for the Debtor

By: Marc C. Capone, Esq.

In Re:

Edward and Patricia Krotulis

Case No.: 19-16062

Judge: Michael B. Kaplan

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☐ Motion for Relief from the Automatic Stay filed by _____ ,
creditor,

A hearing has been scheduled for _____ , at _____ .

- ☒ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for June 12, 2024 , at 9:00am .

- ☐ Certification of Default filed by _____ ,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

- ☐ Payments have been made in the amount of \$ _____ , but have not
been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

We thought we had made all the required payments to the Chapter 13 Trustee. However, upon review of the account ledger, we realized that we had missed a payment and were short on a payment at the time of the step up in June 2021. We were able to make a payment of \$932.00 on May 8, 2024. We will be able to make a payment of \$532.00 by May 15, 2024 and the remaining balance of our

☒ Other (**explain your answer**):

Plan by June 1, 2024. Once all these payments post, we should be complete with our Chapter Plan.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 5/13/2024

/s/ Edward Krotulis
Debtor's Signature

Date: 5/13/2024

/s/ Patricia Krotulis
Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.